

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**HENRY A. CAULEY,**

**Plaintiff,**

**v.**

**CONSERVATION INTERNATIONAL  
FOUNDATION,**

**Defendant.**

Civil Action No.: 1:21-cv-00637-AJT-JFA

**JOINT STIPULATION OF DISMISSAL**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Henry A. Cauley and Defendant Conservation International Foundation that the above-captioned action is voluntarily dismissed without prejudice in its entirety pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). The parties reached an agreement whereby Defendant consented to Plaintiff's amendment of his complaint in the related Virginia state court action (Civil Action No. CL-21-1230 in the Circuit Court for the County of Arlington) to add his claims under the Age Discrimination in Employment Act, 29 U.S.C. § 621 et seq., in exchange for dismissing the instant case and not pursuing the dismissed claims in federal court. Defendant has also agreed not to seek removal of the Virginia state court action to federal court.

*So ordered*  
*10/12/21*  
  
\_\_\_\_\_  
Anthony J. Trenga  
United States District Judge

Dated: October 11, 2021

Agreed To:

For Plaintiff:

/s/ Lawrence P. Postol  
Lawrence P. Postol  
POSTOL LAW FIRM, P.C.  
6842 Elm Street, Suite 300  
McLean, Virginia 22101  
Telephone: (571) 378-6366  
Facsimile: (571) 378-6375  
Lpostol@Postollaw.com  
*Attorneys for Plaintiff*

For Defendant:

/s/ Alexandra M. Romero  
Alexandra M. Romero  
Arent Fox LLP  
1717 K Street NW  
Washington, DC 20006-5344  
Telephone: (202) 828-3469  
Facsimile: (202) 857-6395  
Alexandra.Romero@ArentFox.com  
*Attorneys for Defendant*